

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

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ARIADNA JACOB and INFLUENCES, INC.,	:	
	:	Case No. 1:21-cv-06807
Plaintiffs,	:	
	:	
- against -	:	
	:	
TAYLOR LORENZ and THE NEW YORK	:	
TIMES COMPANY,	:	
	:	
Defendants.	:	
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**DECLARATION OF KATHERINE M. BOLGER IN SUPPORT OF DEFENDANTS
TAYLOR LORENZ AND THE NEW YORK TIMES COMPANY'S
MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT**

I, Katherine M. Bolger, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner at the law firm of Davis Wright Tremaine LLP, attorneys for Defendants Taylor Lorenz and The New York Times Company ("The Times") (collectively, "Defendants") in the above-captioned matter.

2. I submit this declaration to annex documents relevant to the Defendants' motion to dismiss Plaintiffs' First Amended Complaint in this action.

3. Annexed hereto as **Exhibit 1** is a true and correct copy of an article titled *Trying to Make It Big Online? Getting Signed Isn't Everything* written by Lorenz and published in *The New York Times* on August 14, 2020 (the "Article"). This Article forms the basis of Plaintiffs' claims and is also available at <https://www.nytimes.com/2020/08/14/style/influences-tiktok-management-brittany-broski.html>.

4. Annexed hereto as **Exhibit 2** is a chart of the 14 statements that Plaintiffs allege are defamatory.

5. Annexed hereto as **Exhibit 3** is a true and correct copy of the prepublication responses submitted to Defendants by Plaintiffs' counsel on August 11, 2020 in response to questions that Lorenz posed to Plaintiffs.

6. Annexed hereto as **Exhibit 4** is a true and correct copy of the August 11-August 13, 2020 prepublication email exchange between Lorenz and Plaintiffs' counsel regarding Plaintiffs' responses to Lorenz's questions.

7. Annexed hereto as **Exhibit 5** is a true and correct copy of a September 19, 2019 talent management and representation agreement between influencer Brittany Tomlinson and Creator Edge, Inc. (dba "Influences") signed by Tomlinson and Plaintiff Ariadna Jacob.

8. Annexed hereto as **Exhibit 6** is a true and correct copy of the Petition to Determine Controversy that Tomlinson filed against Plaintiffs on April 29, 2020 with the California Department of Industrial Relations Division of Labor Standards Enforcement.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 23, 2021

/s/ Katherine M. Bolger
KATHERINE M. BOLGER